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ABSTRACT

The intent of the investigation reported here was to study the impact of the Education Consolidation and Improvement Act (ECIA) on educational evaluation at the state and local level. The study had three major purposes: (1) to investigate the state education agency (SEA) and local education agency (LEA) responses to changing evaluation requirements under Chapter 1 and Chapter 2 of ECIA, (2) to discover new evaluation-related methodological problems, and (3) to identify changing evaluation training and technical assistance needs. Through a 10-month, longitudinal interview study of evaluators in five western state departments and five large school districts, some preliminary results emerged. Reductions in money and staff have indeed brought about consolidation, but improvement is still an open question. Budget reductions are affecting educational programs more than the new Chapter 1 and Chapter 2 legislation. Much of the Chapter 2 money is being spent on materials and equipment, especially microcomputers. Evaluation units seem to be shifting away from monitoring and evaluation and focusing more on technical assistance and leadership. These and other findings are discussed in this report. (BW)

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paper and report series

No. 79 **A STUDY IN CONTRASTS: EFFECTS OF THE EDUCATION CONSOLIDATION AND IMPROVEMENT ACT OF 1981 ON SEA AND LEA EVALUATION**

Peter J. Gray
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# Research on Evaluation Program

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Reactions and comments welcomed.

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## PREFACE

The Research on Evaluation Program is a Northwest Regional Educational Laboratory project of research, development, testing, and training designed to create new evaluation methodologies for use in education. This document is one of a series of papers and reports produced by program staff, visiting scholars, adjunct scholars, and project collaborators--all members of a cooperative network of colleagues working on the development of new methodologies.

What effect has the Education Consolidation and Improvement Act of 1981 had on evaluation practice at the state and local level? Through a ten month, longitudinal interview study of evaluators in five western state departments and five large school districts, some preliminary results begin to emerge:

- Reductions in money and staff have indeed brought about consolidation, but improvement is still an open question.
- Budget reductions are affecting educational programs more than the new Chapter 1 and Chapter 2 legislation.
- Much of the Chapter 2 money is being spent on materials and equipment, especially microcomputers.
- Evaluation units seem to be shifting away from monitoring and evaluation and focusing more on technical assistance and leadership.

These and other findings are discussed in this report.

Nick L. Smith, Editor
Paper and Report Series

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The cooperation and hard work of many people were combined in developing this report. Thanks first go to our SEA and LEA respondents without whose enthusiastic cooperation, expertise and articulateness this study would have foundered. They are a group of truly dedicated evaluators trying to maintain good evaluation practice and make improvements under particularly difficult circumstances.

Lynde Paule, a research assistant extraordinaire, was instrumental in summarizing the November interviews. She also drafted the wording for some of the summaries which appear in the narrative portion of this report.

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# A STUDY IN CONTRASTS: EFFECTS OF THE EDUCATION CONSOLIDATION AND IMPROVEMENT ACT OF 1981 ON SEA AND LEA EVALUATION

## Study Overview

> Ronald Reagan entered the White House two years ago with a commitment to overhaul the federal role in American education.
>
> "Education," he told the country in a televised address, "is the principal responsibility of local school systems, teachers, parents, citizen boards and state governments."...
>
> Two years later, as members of the Administration are the first to acknowledge, efforts to redefine and reshape the Federal role in education show mixed results.
>
> (The New York Times, November 14, 1982)

One of the basic moves by the Reagan Administration in its effort to change the federal role in education was to propose the consolidation of most categorical education programs into a few large block grants. Congress, reacting to pressure from those representing the disadvantaged, the handicapped, and others, resisted this move.

In the end, the major legislation for the disadvantaged (Title I of the Elementary and Secondary Education Act, ESEA), the handicapped (PL 94-142, Education for all Handicapped Children Act), vocational and adult education (The Vocational Education Act), and a few other programs (e.g., impact aid, student financial assistance) survived as separate entities. But, 30-40 previously categorical aid programs were combined into one large block grant. Included were such programs as basic skills education, metric education, consumer education, gifted and talented education, and programs providing funds for library resources, textbooks and instructional equipment, guidance and counseling, desegregation, and teacher training and in-service.

The disadvantaged student legislation, Title I, and the block grant legislation were combined in Subtitle D of Title V of the

Omnibus Budget Reconciliation Act of 1981 (PL 97-35) as Chapters 1 and 2, respectively, of the Education Consolidation and Improvement Act of 1981 (ECIA). The resultant effects of Chapter 1 and Chapter 2 offer graphic examples of the mixed results achieved by the Administration.

The reasoning behind Chapter 1 and Chapter 2 is reflected in the legislation itself (PL 97-35, August 13, 1982). The Chapter 1 Declaration of Policy states that it is the intent of the legislation to:

> eliminate burdensome, unnecessary, and unproductive paper work and free the schools of unnecessary Federal supervision, direction, and control.
>
> (p. 95 STAT. 464)

In addition, it is intended that the legislation will do away with

> overly prescriptive regulations and administrative burdens which are not necessary for fiscal accountability and make no contribution to the instructional program.
>
> (p. 95 STAT. 464)

The purpose of the block grant (Chapter 2) was clearly to free state and local education agencies to set their own priorities and conduct programs as they saw fit. Beyond this intent, the new legislation was:

> to do so in a manner designed to greatly reduce the enormous administrative and paperwork burden imposed on schools at the expense of their ability to educate children.
>
> (p. 95 STAT. 469)

Clearly, the intent of ECIA was to shift the responsibility for setting policy, monitoring fiscal procedures, and designing, operating, and evaluating educational programs out of Washington, D.C. The full impact of this shift on state and local education agencies and ultimately on this nation's children is now only beginning to manifest itself.

## Study Purpose

The intent of the investigation reported here was to study the impact of the ECIA legislation on educational evaluation at the state and local level. The study had three major purposes: (1) to investigate the state education agency (SEA) and local education agency (LEA) responses to changing evaluation requirements under Chapter 1 and Chapter 2 of ECIA, (2) to discover new evaluation-related methodological problems, and (3) to identify changing evaluation training and technical assistance needs.

We were able to focus only on the initial impact of ECIA since, as of November 1982 when the final interviews for this study took place, Chapter 2 of this legislation had been in effect for five months and Chapter 1 for just two months. In some cases our preliminary findings may hold true for the long run. In other cases, additional changes may alter dramatically the perceptions and implementation of Chapter 1 or Chapter 2 requirements. It is precisely because final results are not yet available, that these "early returns" are so important. They can provide us with initial insights into the impact of ECIA and can help to shape further research on this and other legislation.

In order to fully understand the effect of Chapters 1 and 2 on program evaluation operations, on evaluation methodology, and on evaluation training and technical assistance needs, we need to assess first the general impact of the legislation at both the SEA and LEA levels. Therefore, we examined changes in the following four areas related to the impact of ECIA.

- The evaluation context: monetary and staff-related changes resulting from the enactment of ECIA.
- The transition to Chapter 1 and Chapter 2: administrative, structural, and programmatic changes.
- Shifts in evaluation and monitoring focus and responsibility.
- Emerging evaluation information and technical assistance needs.

These four areas form the framework for analyzing and reporting the information collected from our field respondents. Before summarizing that information, however, it is necessary to review briefly the Chapter 1 and Chapter 2 legislation and the design of the study reported here.

## Background on Chapter 1 and Chapter 2

We can appreciate better the impact of the ECIA on program evaluation and more clearly understand the responses of SEAs and LEAs if we first know the major features of the legislation and especially how it differs from previous legislation. For this purpose, brief summaries of Chapter 1 and Chapter 2 are presented next.

Chapter 1. The following is the Declaration of Policy as it appears in ECIA Chapter I:

> CHAPTER 1--FINANCIAL ASSISTANCE TO MEET SPECIAL EDUCATIONAL NEEDS OF DISADVANTAGED CHILDREN
>
> Declaration of Policy
>
> Sec. 552. The Congress declares it to be the policy of the United States to continue to provide financial assistance to State and local educational agencies to meet the special needs of educationally deprived children, on the basis of entitlements calculated under Title I of the Elementary and Secondary Education Act of 1965, but to do so in a manner which will eliminate burdensome, unnecessary, and unproductive paperwork and free the schools of unnecessary Federal supervision, direction, and control. Further, the Congress recognizes the special educational needs of children of low-income families, and that concentrations of such children in local educational agencies adversely affect their ability to provide educational programs which will meet the needs of such children. The Congress also finds that Federal assistance for this purpose will be more effective if education officials, principals, teachers, and supporting personnel are freed from overly prescriptive regulations and administrative burdens which are not necessary for fiscal accountabiity and make no contribution to the instructional program.
>
> (PL 97-35, August 13, 1982, p. 95 STAT. 464)

The specific changes embodied in Chapter 1 are as follows:

- a reduction in the percent allowed for state administration of these programs from 1.5% to 1%;
- the elimination of all requirements for Parent Advisory Councils;
- a reduction in the requirement for maintenance of effort from 100% to 90% of the second preceding year for either aggregate expenditures or for combined fiscal effort per student;
- the transfer of responsibility for waivers of the maintenance of effort requirement from the federal government to the State Education Agency;
- the elimination of requirements for a comparability report;
- a ban on the issuance of regulations by the Secretary of Education in the areas of program planning, development, implementation, or evaluation; and
- a statement that, "Regulations issued pursuant to this subtitle shall not have the standing of a Federal statute for the purposes of judicial review."
(American Institutes for Research, 1981, p. iv.)[1]

Since the specific focus on this study is program evaluation at the state and local level, the sixth item on the above list is of special interest. In essence, this ban on the issuance of regulations regarding evaluation as well as other related topics means (1) that the Title I evaluation models (A--norm referenced, B--control group and C--criterion referenced) are no longer required, (2) that any evaluation schedule which satisfies the frequency requirement of "at least once every three years" may be used and (3) that any objective measurement instrument may be used.

While these changes are dramatic in terms of their potential impact on Chapter 1 program operation and evaluation, they are modest compared to the sweeping changes in program and evaluation focus embodied in Chapter 2.

Chapter 2. The following is the statement of purpose as it appears in ECIA Chapter 2:

CHAPTER 2--CONSOLIDATION OF FEDERAL PROGRAMS FOR ELEMENTARY AND SECONDARY EDUCATION

Statement of Purpose

Sec. 561. (a) It is the purpose of this chapter to consolidate the program authorizations contained in--

(1) titles II, III, IV, V, VI, VIII, and IX (except Part C) of the Elementary and Secondary Education Act of 1965

(2) the Alcohol and Drug Abuse Education Act;

(3) part A and section 532 of title V of the Higher Education Act of 1965;

(4) the Follow Through Act (on a phased basis);

(5) section 3(a)(1) of the National Science Foundation Act of 1950 relating to precollege science teacher training; and

(6) the Career Education Incentive Act;

into a single authorization of grants to States for the same purposes set forth in the provisions of law specified in this sentence, but to be used in accordance with the educational needs and priorities of State and local educational agencies as determined by such agencies. It is the further purpose and intent of Congress to financially assist State and local educational agencies to improve elementary and secondary education (including preschool education) for children attending both public and private schools, and to do so in a manner designed to greatly reduce the enormous administrative and paperwork burden imposed on schools at the expense of their ability to educate children.

(b) The basic responsibility for the administration of funds made available under this chapter is in the State educational agencies, but it is the intent of Congress that this responsibility be carried out with a minimum of paperwork and that the responsibility for the design and implementation of programs assisted under the chapter shall be mainly that of local educational agencies, school superintendents and principals, and classroom teachers and supporting personnel, because they have the most direct contact with students and are most directly responsible to parents.

(PL 97-35, August 13, 1982, p. 95 STAT. 469)

There appears to be some disagreement as to the exact number of programs "folded into" Chapter 2. The law itself does not give a number but simply lists where the programs are consolidated from. In the final regulations for ECIA it is stated that, Chapter 2 consolidates 28 programs into a single grant (Federal Register, November 19, 1982). A fact sheet on the authorization bill numbers them as 29, but in the accompanying list there are only 27 programs named. Keating (n.d.) notes that ECIA "repealed or combined up to 42 categorical programs...with Chapter 2 funding the remaining 29." (p. 1)

Hansen (1981) states that, "the list of authorized activities is very general and quite extensive apparently including all of the activities contained in 'antecedent legislation'", that is, "the 32 previous programs which are being 'folded into' this one title." (p. 4) A count of the topics and subtopics under the "authorized activities" of Chapter 2's Subchapter A, B, and C results in a list of 33 activities (PL 97-35, August 13, 1981, p. 95 STAT. 473-476). An LEA may choose to spend all of its Chapter 2 funds on one activity or it may spread the funds among any combination of activities. The authorized activities are summarized in Appendix A of this report.

As will be seen in the results section of this report, some states and school districts are confused and concerned about the long and sometimes vague list of "authorized activities." As Keating (n.d.) notes:

> The problem of competition within the district is intensified by the virtual absence of federal technical assistance with respect to the consolidated programs' goals of implementation. Thus those who have already received federal support will be in a much better position to secure their programs...
>
> (p. 4)

In addition, Chapter 2 evaluation requirements are virtually nonexistent. State and local applications must only contain agreements to keep such records and provide such information as reasonably "may be required for fiscal audit and program

evaluation, consistent with the responsibility of" the Secretary and state. (PL 97-35, August 13, 1981, Sections 564(a) (6), and 566(a) (3)) In addition, according to Section 564(a) (5), a state must submit an application which:

> beginning with fiscal year 1984, provides for an annual evaluation of the effectiveness of programs assisted under this chapter, which shall include comments of the advisory committee, and shall be made available to the public.
>
> (PL 97-35, August 13, 1981, p. 95 STAT. 471))

This is a far cry from the specific evaluation requirements of previous legislation (e.g., Title IV-C ESEA Improvement in Local Practices, Title IV ESEA Emergency School Aid for School Districts Undergoing Desegregation, Title III ESEA Special Projects).

Thus under both Chapter 1 and Chapter 2 we see a dramatic lessening of the previous federally imposed mandate to evaluate educational programs.

## Study Design

Five western states were chosen for this study as being representative of states in this part of the country. They, therefore, provide only a limited sample of perspectives regarding the impact of ECIA. Western states were selected because an explicit focus of this study was the area of emerging information and technical assistance needs of states served by our agency. Within these states, people were interviewed who were (a) responsible for evaluation in general and/or (b) responsible for Chapter 1 and Chapter 2 programs in particular, at the state level and in the largest school district in each state.

Six 15- to 30-minute telephone interviews were conducted with each field respondent from February to November 1982. Respondents were interviewed once a month from February to June, and then, a final interview was conducted in November. The benefit of the telephone interview technique was that it could easily fit into respondents' schedules and did not necessitate

any travel on the part of the interviewer. A limitation was that some of the rapport of face-to-face contact may have been lost.

A semi-structured interview instrument was developed and revised on the basis of pilot trials. Subsequent modifications were made to the form as necessary to reflect changing field conditions. The same basic questions were addressed throughout the study, however, and form the basis of the results presented here.

At the time of the initial interviews, the ECIA was not yet in effect, and even in November there had been a maximum of five months of experience with it. However, our respondents knew the thrust of the Act and were preparing for its implementation well in advance of its starting date. It was, therefore, possible to follow changes in anticipated effects of the Act up to the point of its formal beginning and then to compare those expectations with perceptions formed during the actual operation of the Act. Also, in the final November interview, respondents were asked to send backup documentation concerning Chapter 2 allocations and evaluation plans. This documentation provided a rich source of information for illustrating the changes which have occurred relative to Chapter 2.

## The Evaluation Context

The aim of this study was to capture the way professional educators are responding to the evaluation related aspects of the Education Consolidation and Improvement Act's (ECIA) Chapters 1 and 2. In order to view their responses from the proper perspective, it is necessary to know (1) with whom we talked, and (2) what changes have occurred in their funding and staffing levels. This first area of ECIA impact is discussed below.

### Respondents

Over the course of this study we talked with more than 30 professional educators at the state and local level. At the state level there was a change of personnel in three of the five

statewide evaluation positions and one of the Chapter 1 positions. One state experienced two changes in evaluation unit directors in the 10-month period of the study. At the local level there were three changes in personnel. That meant we talked with new people in one district-wide evaluation unit and two Chapter 1 units.

There were 24 respondents to the final interview in November:

5 SEA evaluation directors
5 LEA evaluation directors
5 SEA Chapter 1 directors
5 LEA Chapter 1 directors
4 LEA Chapter 2 sources

In relation to Chapter 1 and Chapter 2 evaluation, SEA evaluation directors indicated the following pattern of focus: 3 - Chapter 2 only; 2 - both Chapters 1 and 2. Three of the five LEA evaluation directors reported responsibility for both Chapter 1 and Chapter 2 evaluation. Two had no Chapter 2 responsibility, but only Chapter 1. Of course, the directors and their staff had other responsibilities, such as statewide and district-wide testing programs, research and other evaluation studies, policy analysis, and technical assistance to other state and local units. In fact, Chapter 1 and Chapter 2 evaluation was a relatively small part of their total responsibility.

As would be expected, SEA and LEA Chapter 1 directors reported responsibility primarily for Chapter 1 and related evaluation. For example, besides responsibility for processing Chapter 1 data, they reported responsibility for other state compensatory education programs, including bilingual, Indian, early childhood, and neglected and delinquent education programs as well as responsibility for district-wide testing. One SEA Chapter 1 director also reported Chapter 2 evaluation responsibilities.

Because of the newness of Chapter 2, and in many cases the lack of well defined evaluation procedures, four local directors recommended that four new Chapter 2 sources be interviewed. These sources were sometimes in curriculum units and other times

in grants management-type units. They were invaluable in providing detailed information about Chapter 2 expenditures and evaluation plans.

Changes in Funding and Staff

It became clear by the November interview that most of the agencies surveyed had sustained some budget cuts and staff reductions over the last year. In some cases the reductions had begun as early as two years ago due to economic and local political changes. Some reductions in the last year took place in anticipation of 1982-1983 cuts. In one case a small, fifteen percent, cut had occurred this year and a similar reduction was anticipated in each of the next few years. This would gradually reduce staff. In another case, large cuts were taken in travel and materials allocations in order to save staff positions.

Data from state and local evaluation directors show that five reported changes in budgets and four reported no change. While no direct data were available from the tenth agency, the general reorganization currently underway and the related staff reduction already experienced by other units suggests at least modest reductions.

1981-1982 Chapter 1 funding from the federal government was reduced by 20-30% in comparison with 1981-1982 Title I funding. There are no specific figures available to compare Chapter 2 funds with the total of all the funds that were allocated for the various categorical programs that it subsumed. However, all of our respondents who were knowledgeable about the categorical programs and Chapter 2 noted serious reductions.

Reductions in funds were experienced not only relative to federal sources but also state sources. This was due to the general economic troubles of the states and cities in our sample. As a result of funding reductions, three state Chapter 1 respondents reported staff reductions ranging from 25-33%. One local Chapter 1 respondent reported a 50% cut in staff. One state evaluation director reported a 75% reduction in staff, while three local level evaluation directors reported staff

reduction (1, less than 5%, and 2, from 55-80%). All together, eight of the twenty respondents reported some reductions in staff.

The reported number of budget reductions or staff reductions, or lack of reductions, does not, however, present the whole picture of changes at the state and local level. The absence of much change in some states has to do with the fact that they were already receiving the minimum state allocation and that has not changed. However, larger states have had pronounced cutbacks.

The federal contribution to any state or local evaluation budget is generally modest. In the February interviews, SEA evaluation directors reported from 0% to 59% when asked about the federal share of their evaluation budget (the average was 30%). Local evaluation directors reported a 10% to 18% federal share in their evaluation budgets (the average was 15%). Eighteen percent of the total evaluation office budget was the figure reported as the average federal share of a national sample of 215 local evaluation offices in school districts with 10,000 or more students (Lyon et al., 1978, p. 57).

The word "consolidation", as in Education Consolidation and Improvement Act, is especially apt in talking of Chapter 2 budget and staff changes. In the past, people have been funded from a variety of sources and have, as a result, performed a variety of duties. Now there has been a consolidation. The comments of one SEA evaluation director help to illustrate this change:

> [the] change that has taken place is that [whereas] previously some of our employees were funded with bits and pieces of administrative budgets of programs they were covered in, <u>now</u> everyone in this section is being funded by the 20% of Chapter 2 funds earmarked for use at the state level.

What we have seen is a consolidation of staff in terms of the organization, a modest reduction in terms of numbers, and a subsequent broadening of responsibilities. The potential result of these changes is that staff will have less time to spend with their clients and, therefore, their contact will be more superficial than before. This change in the nature of the

relationship between SEA evaluators (both Chapter 1 and Chapter 2) and their clients is described in terms of a move away from program evaluation and thorough program monitoring to more leadership, technical assistance, and cost accounting as monitoring.

The specific changes embodied in Chapter 1 and Chapter 2 are discussed in the next section.

## Transition to Chapter 1 and Chapter 2

Before looking at the specific evaluation related effects of ECIA, it might be well to examine the important general changes which occurred in the transition to ECIA. This is the second area of focus of this study.

Plans for implementing Chapter 1 and Chapter 2 were at quite different stages in February. In many cases these differences continued into November. The differences were the consequences of the nature and extent of the changes embodied in Chapter 1 and Chapter 2. Understanding these changes will help to make clear the reasons behind the mixed results of the Education Consolidation and Improvement Act.

### Kinds of Change

There are essentially five kinds of changes that are either the intent and/or the result of ECIA:

- organizational changes--new lines of communication (administrative reorganization)
- structural change--new areas of responsibility (functional reorganization)
- program justification change--new reasons for offering particular programs
- program operation change--new way of running a program
- program effect change--new outcomes of a program

Our preliminary findings suggest that the ultimate effects of

Chapter 1 and Chapter 2 may not be consistent with their intents. While the intended effects of the acts have potential for influencing evaluation methodology and technical assistance and training needs, it is the results which must be examined most closely in order to assess the real impact of ECIA.

Transition to Chapter 1

Chapter 1 intent, as implied by its declaration of policy, seems to suggest organizational and structural change, since administrative and functional elements such as paperwork, unnecessary federal supervision, direction, and control, and overly prescriptive regulations and administrative burden are to be reduced or eliminated. Evident from the comments of state Chapter 1 respondents (formerly Title I respondents) is that the major components of Title I were transferred to Chapter 1. Let us look more closely at what changes did or did not occur regarding Chapter 1.

Organizational change. All five SEA Title I respondents said they were going to continue the central evaluation mechanism called Title I Evaluation and Reporting System (TIERS), with minor modifications. This was confirmed in the November interviews. In May, four of the five state level Title I respondents reported having conducted workshops related to the new legislation with the fifth planning to provide a workshop for local districts in the fall. However, no surprises were anticipated. As of June, three of the five indicated they would use the same formula as last year to allocate funds to local districts. There were no data from the other two SEA Title I respondents on this point.

The elimination of the requirement for Parent Advisory Councils is another change in the "lines of communication." In light of the shift of responsibility for rule-making from the federal to the state level, our respondents reported that they are retaining the spirit of parent involvement, but are viewing the organization of that involvement in a much more flexible, and they feel more effective, way. Some SEAs are changing the

requirements regarding the composition of parent advisory councils (PACs). The PACS are becoming less representative, but, they feel, more productive. That is, people are included not for just the sake of representation, but because of their willingness to work and commitment to the program. Some LEAs are eliminating school building councils and only having a district council. Others have established a Chapter 2 advisory council that draws part of its membership from the Chapter 1 council. This is a good example of the impact of ECIA in increasing the options of the local administrator.

While there was much activity at the state level from February to June in getting ready organizationally for Chapter 1 (e.g., rewriting forms, informing people of major changes, working on a non-binding handbook) there was almost no reported activity at the local level.

Structural change. It is important to note that in early interviews, when state and local Title I directors were queried about such matters as level of paperwork, supervision, administrative burden and so on, four of the five SEA Title I directors said present paperwork was not burdensome, and one said it was burdensome but not unnecessary. Another respondent said, "a few reports require an excessive amount of paperwork, but in general most of the paperwork required is purposeful for a good educational program." Four out of the five state Title I respondents anticipated little or no change in paperwork under Chapter 1. In November, four SEA Chapter 1 respondents reported a decrease in the amount of paperwork they were requiring of local districts. One reported no change in paperwork.

Four of the five SEA Title I directors also said they had not suffered from unnecessary federal supervision or control. They anticipate somewhat to much less federal supervision under Chapter 1, but did not feel the local programs would sense any change. As one respondent noted, "Federal supervision has been indirect. The only change is that responsibility has now been formally passed on to state so locals won't see a difference." They also anticipated that state supervision will be less.

Three of five local Title I directors said in early interviews that they did not perceive the paperwork as being unnecessary or burdensome, nor did they suffer from unnecessary supervision or control. One respondent was not interviewed on this point and another reacted that the state reporting system was definitely burdensome and that there was unnecessary supervision.

Three of the five local Title I directors also did not anticipate that burdensome and unnecessary paperwork would be eliminated under Chapter 1. The other two were simply not sure of the likely impact of Chapter 1 in this area. In the November interviews, four local Chapter 1 directors reported that even though the state was supposedly requiring less, they saw no change in the paperwork. One respondent did say that paperwork "hasn't been quite so monumental."

Even though states eliminated some parts of the application and reporting process, for example, project descriptions, comparability descriptions, and parent advisory council data, the November interviews suggested that local administrators now felt pressure to maintain more records themselves in the event of an audit. In fact, some administrators saw OMB Circular A 102 Attachment P as suggesting that audits might encompass both fiscal procedures and program performance. These concerns suggest structural changes at the local level that, in effect, at least maintained and in some cases increased paperwork and administrative burden.

When interviewed in February, 1982, in most cases both SEA and LEA evaluation directors reported a wide range of evaluation responsibilities. These included, for example, evaluation of all federal and state categorical programs, operating the state or district assessment program, policy analysis, planning, high school graduation testing, research and evaluation design and proposal development, and needs assessment.

Even Title I personnel reported a variety of other responsibilities. In addition to Title I evaluation and reporting, staff were responsible for evaluating bilingual

programs, Indian education, neglected and delinquent programs, and state driver education. They often had program leadership responsibility as well. This wide range of activities grew as a result of budget cuts and staff reductions as reported in November interviews.

There was a consistent reporting of movement from monitoring and supervision toward leadership and technical assistance on the part of SEA evaluation and Chapter 1 respondents. It is not as though they did not do these before; it is just that with fewer staff and the loosening of Chapter 1 requirements, they were in a position to assume a role in which they felt comfortable.

Both state and local respondents focused their attention on local programs when asked about the extent to which the goals of flexibility, decentralization, and lessening of administrative burden have been achieved relative to Chapter 1. There was no discussion of the realization of these goals at the state level.

Four out of five SEA Chapter 1 respondents said there was now more flexibility at the local level. But only two out of five LEA Chapter 1 respondents reported more flexibility. The other three reported there were no changes. Very few SEA respondents commented one way or the other about Chapter 1 related decentralization and lessening of administrative burden specifically. Those local directors who did see a change pointed out that they have more flexibility in measurement and testing areas such as deciding which tests to use, when to test, and how to report results.

Overall, there was not a strong or consistent feeling that there was much change in the structural aspects of Chapter 1 concerning flexibility, decentralization, and administration.

Program justification. None of our respondents made any comments about change in program justification. However, one local Chapter 1 evaluator did suggest that the need to reduce their program had caused them to target their program more carefully.

The new requirements (listed in Appendix B of this report) essentially lay out the criteria for evaluating local programs.

The criteria include: (1) the requisite characteristics of students and areas within a district to whom services are to be provided; (2) the need to base services on "an annual assessment of educational needs"; (3) the requirement that programs be of sufficient "size, scope, and quality" to have the potential for success; (4) the necessity for program evaluation in terms of "objective measurement of educational achievement in basic skills" and whether "improved performance is sustained over a period of more than one year"; and finally (5) the requirement that provisions be made for serving "educationally deprived children attending private elementary and secondary schools."

The reason for the lack of concern over program justification may be that the language in the Chapter 1 legislation regarding the characteristics which programs need in order to be authorized has simply been reduced in amount. The state and local Chapter 1 directors have been living under similar requirements over the past few years. But they now are faced with less direction, an example of the freeing of local educators from "overly prescriptive regulations." It remains to be seen whether or not this will result in a significant change in the kinds of students served, the quality of programs provided, and the kinds of program evaluation carried out.

Program implementation. While there appears to be little in the way of intended program changes implied in the Chapter 1 policy, it became apparent from the November interviews that there were some major changes in local programs due to budget reductions.

Adjustments at the administrative level could be made by both SEAs and LEAs to compensate for budget cuts and inflation. One of the districts in the study had a 19% increase in teachers' salaries this year. However, since local program staff represent the bulk of program costs, staff were the major focus of cuts given reductions in the budget.

An LEA Chapter 1 respondent reported that, to compensate for budget reductions, an entire elementary school was dropped from the Chapter 1 program. In another district it was reported that

the number of Chapter 1 teachers fell from 80 to 50. In another district, teacher aides became the focus of cuts, dropping from 15 to 1 at the elementary level and from 11 to 5 at the junior high level.

Program effect. Program changes resulting from staff reductions and budget cuts have had a definite effect on the provision of services to Chapter 1 students. For example, the exchange between the interviewer (Q) and one respondent (A) went like this:

> Q. What would you say the impact of losing almost one million dollars has been on your Chapter 1 program?
>
> A. It has been separated on two issues. Revised Chapter 1 regulations have seen very little change in the operation of Title I. The real change has come about because of decreased funding, which has severely crippled our program. I was at a school this morning that had five aides and a teacher last year; this year it has one aide and a half-time teacher. That's a big difference in numbers of kids they can serve, etc. They've reduced their math services to working with 10 kids as opposed to 40. That resulted because of budgetary cuts, not Chapter 1 regulation.
>
> Q. What would you say is the decrease in the number of children served?
>
> A. Probably 1,000--we're down to 8,000 from 9,000, approximately. When you go to individual schools you can really see what that means...

As teachers and aides are eliminated, the number of students served necessarily drops since state guidelines specify the ratio of staff to students served. The effects on students implied by this respondent's comments seem to run counter to the intent of Chapter 1 to maintain services to children.

General conclusions and the implications for further research of the Chapter 1 organizational, structural and programmatic changes are discussed in the last section of this report.

Summary of preliminary Chapter 1 findings. A brief overview of Chapter 1 results is presented next. These preliminary findings are based on the discussion in the previous sections of this report. This discussion focuses on the sometimes subtle differences between state and local perceptions and provides examples of differing perceptions in regard to such concepts as paperwork, supervision, and flexibility. This discussion should be kept in mind when reading the following findings.

The Title I Evaluation and Reporting System (TIERS) is in essence being retained in all states represented in this study.

Parent involvement in Chapter 1 programs is taking on new forms.

Title I paperwork was not seen as burdensome and unnecessary, nor has any change in this regard been reported at the local level relative to Chapter 1 paperwork.

There was, overall, little perceived change in flexibility, decentralization or administrative burden reported by state and local Chapter 1 directors.

Chapter 1 budget reductions have had a dramatic impact at the local level resulting in cuts in instructional staff and consequently a reduction in the number of students served.

Transition to Chapter 2

Sweeping organizational, structural, and programmatic changes are implied by the Chapter 2 Statement of Purpose. Program priorities are to be decided by state and local agencies; "the enormous administrative and paperwork burden" is to be "greatly reduced," and the responsibility for the design and implementation of programs "shall be mainly that of local education agencies...because they have the most direct contact with students and are mostly responsible to parents." (PL 97-35, 95 STAT. 469, August 13, 1982).

Here, again, the changes that resulted are not altogether those implied in ECIA's stated purpose. Based on our interviews, there appears to have been a great deal of Chapter 2 related activity from February to June at the state level, and as of

November, at both the state and local level. In order to get a more complete picture of Chapter 2 changes, four respondents were added to the local evaluation group for the November interviews.

Our respondents reported that state activity began as early as December 1981 in one state, with the establishment of the required State Advisory Committee. As of May 1982 these committees had recommended allocation formulas, put out reports and made policy recommendations, and, in general, met their statuatory requirements. In at least one case their recommendations focused quite specifically on program evaluation matters. For example, one respondent said:

> As far as evaluation goes, we have an interesting phenomena in that the state advisory group is trying to require more than the statute will permit them to require, and we are working with them to get some sensible middle ground...

Other activities took place in regard to state level preparation for Chapter 2. There was much general planning going on from February to June. In addition, some states developed:

- state level priorities
- forms for local districts to use to apply for Chapter 2 funds
- plans for monitoring and evaluating Chapter 2 programs
- computer programs to account for Chapter 2 funds

Many SEAs also offered workshops to inform local school districts of Chapter 2 changes.

Just what changes have occurred relative to Chapter 2? Next we take a look at each of the five areas of change from both the local and state perspective to see what has and has not changed.

Organizational change. Due to the consolidation necessitated by reduced budgets and staff and by the block grant structure, there are new lines of communication resulting from reorganizations at both the state and local levels. Generally, each LEA evaluation unit has experienced a budget cut which has resulted in a change in staffing. A change in staffing has meant a consolidation of offices and responsibilities. This has

affected the scope of research and evaluation at the LEA level. Many of these changes began in early 1982, most likely in anticipation of new federal legislation and because of the recession throughout the western part of the United States. Larger LEAs tended to experience greater budget cuts than smaller LEAs. Along with the budget cuts came staff reductions and internal reorganizations.

Here, again, consolidation was the watchword. Instead of multiple program administrators scattered throughout the organization, many SEAs and LEAs are consolidating Chapter 2 staff and forming more integrated units.

Structural change. There seem to have been some important changes in regard to Chapter 2 responsibilities. A shift has occurred away from monitoring and evaluation toward technical assistance and leadership. While these services do represent the beginning of a new emphasis, they were all part of staff's former role.

A new group to emerge is the Chapter 2 Advisory Committee. All states and at least one district used advisory committees for such tasks as identifying areas of program emphasis, developing allocation formulas, and suggesting evaluation requirements.

There is a clear and consistent perception among LEA respondents regarding the effects of Chapter 2 vis-a-vis flexibility, decentralization, and administrative burden. All LEA Chapter 2 respondents agreed that Chapter 2 has provided both flexibility and decentralization in terms of deciding how and where money should be used. For example, they felt that they now have the flexibility to meet the needs of particular schools and students. One SEA respondent noted the "effect is pretty much what the intent was: decentralization, flexibility, and lessening of administrative burden have been essentially accomplished." Three out of the four SEA evaluation directors responding to this point also agree that there was increased flexibility and decentralization.

However, there is a mixed reaction regarding administrative burden. Some respondents view less paperwork and fewer general regulations as lessening administrative burden. For others this means more responsibility for decision making, planning, coordination and monitoring. One respondent said, "There's probably more administrative burden passed on to the local level than we had under the programs of Chapter 2, inasmuch as someone has to mind the store..." Still others view less paperwork as a potential threat to the long-term maintenance of a program. As one local level respondent said, "down the road a piece,...when it comes time for reauthorization and you look for good data, you won't have it, and that's going to turn around and bite us." An SEA respondent said "possibly we're asking for them to do less this year, but I think that they're (the Feds) going to clamp down on us so we had better have the information."

Program justification. At the state level there is an obvious change in the basis for program justification since requests for program funds no longer have to be justified categorically. Instead, SEA respondents agreed, whatever program areas were identified by LEAs would have to be honored by the state. Some states did, however, establish priority areas within the three subchapters of Chapter 2 through the use of their 20% set aside. (See Appendix A for the areas included under Chapter 2 Subchapters A, B, and C.)

With input from the advisory committee, for example, one state designated various areas as targets for funding. They included: expanding the assessment program, secondary math and English curriculum development and implementation, common requirements for high school graduation, and staff development centers with the major thrust of microcomputer curriculum.

A variety of means were used to determine Chapter 2 expenditures at the local level. One district used an advisory committee to decide which programs to fund. The respondent from this district told us:

> We involved staff, we had superintendents, administrators, teacher organization [representatives], a number of parents from our citizens' review committees. They all reviewed program priorities and anticipated district priorities in the future and we elected to go with a few of those projects from the past, and then we started a couple of new ones; also eliminated a couple from the past. Essentially it was based on recommendations of the different groups that were involved.

In another case, the new statewide adoption of reading and math materials meant that most of the local money would be going into textbooks and related material.

In one district a unique basis for program justification was reported. This district experienced a dramatic cut in its federal funds over the last few years. This year alone its desegregation funds dropped from 11 million to one million. In order to support its desegregation effort, all of its Chapter 2 funds are earmarked for this program (Subchapter B, Number 8).

Programs in individual schools in this district are therefore justified on the basis of their contribution to the district desegregation plan. That is, a program must have the potential to attract and hold the right proportion of students and should not be likely to adversely affect the basic skills achievement of students. The impact of such an approach on program implementation and effects, as well as its implications for program evaluation and technical assistance and training, will be discussed in subsequent sections of this report.

We did not talk to any small school district personnel, but as one respondent said, "If you added up all of the Chapter 2 dollars, and all of the categorical dollars, we're [the large district] getting less; on the other hand, if you look at categorical program funds that were distributed across the state, most districts today are getting more money than they did under categorical programs." Typically these new dollars ranged from $800 to $2,500 per district.

We also found that, since there was a general uncertainty as to the future levels of funding, local administrators did not want to begin building new programs and adding staff. They felt much more comfortable buying things.

Program implementation. Almost without exception, the areas that received the lion's share of Chapter 2 funds, typically 80% or more, are within the Subchapter B areas providing for "library resources, textbooks, and printed and published materials for use by teachers and students for instructional purposes" and other "instructional equipment and materials" (i.e., microcomputers). It is interesting to note that these kinds of expenditures give administrators a great deal of flexibility, may be decentralized to the school building level, and reduce administrative burden because of the straightforward accountability procedures demanded. They are also highly favored by teachers since they provide them with the tools for teaching.

Microcomputers were reported as being high on most districts' priority list. In one state this amounted to $794,000 being spent on what has been nicknamed "the Apple a day program." However, the extent and the rapidity with which they are being purchased also poses some serious questions at the policy, program, and evaluation levels.

Beyond materials and equipment, as anticipated by Keating, those programs which were already in existance and which had an influential constituency and/or established staff and administration remained intact. The desegretation case is the most extreme example of this.

Chapter 2 has also prompted some LEAs to adopt new and innovative practices. Two districts have developed their own mini-grant programs similar to the old Title IV-C program designed to improve school practices. One state is also continuing a teacher incentive program.

In all of these programs, teachers apply for grants via a proposal which must contain program objectives, procedures, staff, materials and an evaluation plan. Often principals are required to sign off on the proposal. The grants typically range

from $1,000 to $3,000 and have stimulated proposals in areas such as music, art, physical education, and computer software. In one district, six Title IV-C validated programs have been offered for adoption. Mini-grants are a good example of another kind of flexibility appreciated by local administrators.

Table 1a and 1b show the distribution of programs under Subchapters A, B, and C of Chapter 2 as reported by SEA and LEA respondents, respectively. People were naturally cautious in their implementation of programs funded with Chapter 2 money. The exception to this may be the purchasing of microcomputers. On the surface, they appear to be simply investments in equipment. However, in order for these investments to pay off, additional people and programs will have to be added.

If funding becomes stable and there is not a proliferation of regulations, we may see a significant change in programs with the mini-grant and local advisory committee concepts leading the way.

Program effect. There is an amazing diversity of areas of program effects which may result from the distribution of Chapter 2 funds. Microcomputer hardware and software purchases, desegregation programs, and mini-grants are but the most obvious when thinking about the impact of Chapter 2. The effects of major purchases of library resources and textbooks to the exclusion of other program expenditures is another interesting area. The impact of setting educational proficiency standards and providing staff development to improve instruction in basic skills is likely to be immense.

Our respondents did not report any specific effects that they are anticipating. Therefore in the third section of this report, the policy, practice, and outcome questions stimulated by Chapter 1 and Chapter 2 changes will be discussed.

Table 1
Distribution of Chapter 2 Programs
Among Subchapters A, B, and C

| # | Subchapter A | Subchapter B | Subchapter C |
|---|---|---|---|
| | **a. SEA Report of Chapter 2 Program Distribution** | | |
| * 3 | Staff development to improve instruction in basic skills | * 5 Instructional equipment | * 3 Talented and gifted |
| 1 | Diagnostic needs assessment | * 3 Library resources and textbooks | * 2 Educational proficiency standards |
| 1 | Parent participation activities | 1 Staff development | 1 Community education |
| * 1 | Student testing and program evaluation | 1 Programs to improve educational practice | 1 Environmental education |
| 1 | Instruction in reading | 1 Problems of minority isolation and concentration | 1 Health education |
| | | 1 Guidance and counseling | 1 Career education |
| | | 1 Management improvement programs | 1 Arts education |
| | | * 1 Desegration programs | |
| | **b. LEA Report of Chapter 2 Program Distribution** | | |
| | None reported | * 3 Instructional equipment | 2 Talented and gifted |
| | | * 2 Library resources and textbooks | 1 Educational proficiency standards |
| | | 2 Teacher inservice | 1 Community education |
| | | * 2 Desegregation programs | 1 Law related education |
| | | 1 Math/science minigrants | 1 Arts education |

* = Programs reported to receive the greatest proportion of funds.

# = Number of respondents reporting this program (a duplicated count overall).

Summary of preliminary Chapter 2 findings. As with the Chapter 1 results, the reader is encouraged to view these preliminary findings in light of the more indepth discussion presented in the previous sections of this report. The following statements are meant only as a brief overview of this discussion.

The large school districts in our study reported a reduction in funds under Chapter 2 in comparison with the funds received under the previous categorical aid programs.

It was reported that small districts will receive an increase of $800 to $2,500 as a result of Chapter 2.

Typically, 80 percent or more of Chapter 2 funds will go for instructional materials and equipment (largely for microcomputer hardware).

Those categorical programs already in existance are likely to take the remaining Chapter 2 funds.

There was a marked increase in flexibility and decentralization perceived at the local level as a result of the Chapter 2 legislation.

## Shifts in Evaluation and Monitoring Focus and Responsibility

Preceding discussions have implied that, as a result of ECIA, a variety of changes have occurred in the focus of and responsibility for evaluation and monitoring among state and local administrators. In general, since Chapter 1 requirements are simply less specific than those of Title I, few changes in evaluation and monitoring practice are anticipated. Certainly, the provisions of Chapter 2 represent a de-emphasis of program evaluation in comparison with previous categorical programs. In this section we discuss the shifts in evaluation and monitoring focus and responsibility as reported by each of four respondent groups.

### SEA Evaluation Directors

State level evaluation directors reported in earlier interviews that they and their staff performed a variety of

evaluation and other tasks. As is evident from Table 2, these tasks cover Title I and other programs. They also entail a wide range of evaluation and monitoring responsibilities.

There were no great changes in Chapter 1 evaluation and monitoring reported by directors of evaluation. As one respondent noted, "Title I is what they call an institutionalized program, It has a bureaucracy of its own, has a momentum of its own..." SEA evaluation directors indicated that they would continue to provide technical assistance, leadership, and monitoring support relative to Chapter 1.

Depending on a state's use of Chapter 2 funds, that is, for programs or materials, the emphasis on monitoring versus evaluation varied. For the purchase of instructional equipment, materials, library resources and the like, monitoring will be the primary focus. This will concern a rather straightforward accountability regarding "did you do what you said you were going to do?"

SEA Chapter 2 respondents said they will conduct this type of monitoring in a variety of ways. One SEA evaluation respondent indicated that he would undertake a simple analysis of the ways funds are being allocated, based on the application forms from each district. Districts will then be held accountable for documenting expenditures relative to their allocations.

In another case, a computer file is being set up at the state level to track where the money went under the old multiple categorical grants. This information is to be compared and contrasted with where it is now going, especially in regard to the types of students who are being served. This will provide the basis of a system for monitoring districts' efforts to meet the needs of diverse students.

Despite the lack of federal guidelines for evaluating Chapter 2 programs, a few SEAs are moving ahead with plans for requiring evaluations and for providing technical assistance to LEAs to help them develop unique evaluation designs, "unique in the sense of appropriate to the local situation."

Table 2
Evaluation Topics and Other Tasks
SEA Evaluation

- All federal and state categorical programs
- General assessment/state assessment
- Planning
- Task force assignments
- Research and evaluation consultation
- Needs assessment
- Policy studies
- High school graduation assessment
- Title I, migrant, PL 94-142, Title IV-B
- Technical assistance
- Traffic safety program
- Computer support

SEA Title I

- Title I and state compensatory education programs, bilingual/bicultural programs
- Assistance to LEA regarding special education
- Neglected and delinquent education
- Indian education
- Migrant programs
- State driver education program

LEA Evaluation

- Testing
- Survey research
- Technical assistance on test data
- City-wide testing
- Needs assessment
- Research screening and design
- Proposal development
- Financial planning
- Reporting
- Policy planning and analysis

LEA Title I

- Processing Title I data
- Classroom consultation/inservice
- Title I and Indian Program, Early Childhood Program, and Disadvantaged Program
- District-wide testing

Most anticipated they would be involved in Chapter 2 evaluation "very minimally, in the first year." They anticipate playing roles of direction, support, and leadership. When they find "those [districts] that are doing something unique, we will make an individual contact with them to talk about evaluation documentation." One respondent seems to summarize the situation very well:

> We don't require evaluation. We can encourage one at the local level and we'll have some districts that will have some pretty valid information. Overall, on a statewide basis, our state, like other states, will be hard pressed to present some hard data indicating that this program did what the ECIA indicates, educational improvement, particularly. Consolidation, yes--improvement is a question mark.

All five SEA evaluation directors noted that, in applying for funds, an LEA is obligated to collect data for purposes of monitoring and evaluation.

Summary of SEA evaluation director preliminary findings.

Technical assistance, direction, support, monitoring and leadership were the roles most often reported by SEA evaluation directors in relation to Chapter 1 and/or Chapter 2 evaluation.

It was reported that most states will monitor Chapter 2 expenditures for materials in terms of simple cost accounting procedures and programs in terms of counts of students served and staff involved.

SEA evaluation directors foresee the increase in importance of Chapter 2 evaluation and are communicating this to local administrators.

SEA Chapter 1 Directors

Program monitoring, the evaluation and reporting system (TIERS) and sustained effects studies are the major Chapter 1 monitoring and evaluation elements. Monitoring typically involves "going to schools and making sure they've targeted students correctly, that they're reporting correctly [and] collecting appropriate data, have files, have parent involvement--all the things that are basic parts of the law

[must] have some type of documentation." Three of the Chapter 1 respondents reported monitoring as a major task they perform. Most of the other tasks they perform have to do with (1) technical assistance regarding topics such as student selection and testing, (2) evaluation consultation related to sustained effects studies, and (3) program improvement.

While all states indicated that they would continue the use of the Title I Evaluation and Reporting System (TIERS), they also indicated various modifications that they had made. For example, some no longer require project performance data; others do not require districts to report if testing is in or out of level. The general sentiment was expressed by one respondent as follows:

> We're strongly suggesting to districts that they come up with an evaluation program that suits their needs, as well as continuing their reporting system using TIERS.

> I have an idea down the line somebody's going to say "Hey, we have to have some kind of reporting system." So we want to be prepared for that--thus we're going both routes.

The sustained effect study is one way to design an evaluation to suit local district needs. Four of the five SEA Chapter 1 respondents indicated an increased emphasis on sustained effects studies. The other one reported that there are "a lot of good studies going on."

Sustained effects studies are intended to verify that gains made by students between the pretest and posttest are sustained over a longer period of time.

> Thus, a followup measure after the initial pretest-posttest cycle is needed. How soon after the posttest the information should be collected depends on what questions you want to examine.
>
> 1. Are achievement gains occurring during the school year maintained <u>over the summer months</u>?
>
> 2. Do the effects of Title I instruction continue <u>after the students leave the program</u>?

3. How are students performing who were in Title I last year and continued in the Title I program? (Demaline & Rader, n.d., pp. 8-9)

In talking about his state's approach to sustained effects studies, one respondent explained:

> We are letting school districts know that it is one of the elements specified in the law and they must have a sustained effects study on file in the school district some time within the next three years. Starting with Chapter 1, some districts [are] documenting things for the first time that they assumed were taken care of by sending reports to the state office.

State Chapter 1 respondents are generally unsure of the impact of the new legislation. They are worried about cuts in program staff and the resulting loss of service to students. They feel that the "number of students that need to be served and the number of services that need to be delivered has not changed." On the positive side, at least one respondent felt that the changes "got us out of the complacency we were in...people are taking a look at programs and trying to make them more effective." We will have to watch carefully the results of the monitoring visits and sustained effects studies, as well as those from TIERS. They will tell us the actual effects on students of the budget cuts and program changes .

Summary of SEA Chapter 1 director preliminary findings.

SEA Chapter 1 respondents reported monitoring and technical assistance as their major Chapter 1 tasks and mutual planning, leadership, and instructional support as the focus of their relationship with LEA Chapter 1 staff.

An increased emphasis on sustained effects studies was also reported by SEA Chapter 1 directors.

Local Evaluation Directors

A major task performed by most local evaluation units is the operation of the citywide testing program. They select tests, oversee the administration of the tests, and analyze and report the test data. Within this context they are also aware of the Chapter 1 testing program. There was agreement that TIERS would be continued. There were also some reports of interesting sustained effects studies going on that have potential district-wide implications.

One city school system has been using an analytical procedure called Linear Structural Relations to develop causal models of classroom interactions. The purpose is to identify teaching behaviors which are related and, in fact, causal to learning. They are in their third year of field trials of this study and expect to begin staff development sessions this year, based on the findings.

In another school system, an extensive ethnographic study of the teacher practices and administrative practices in Chapter 1 school has been going on for the past two years. They are focusing on administrative styles, school climate, staffing problems, etc. During this year they will provide inservice training to their staff in ethnographic techniques. And, they are beginning to develop plans to address the problems that the study has thus far revealed.

Typically, the Chapter 1 director does the administrative work for the program, including monitoring. The evaluation director and staff generally do not have any responsibility for this program.

As reported in November interviews, the evaluation of Chapter 2 will vary, depending on the type of activity, e.g., program or materials, and whether the activity previously had an evaluation component tied to it. If the activity is still operating, then whatever evaluation accompanied it will

continue. If the activity is new and is a program, the following types of evaluation activities are likely to be conducted:

1. keeping a number count of students as well as an accomplishment count in terms of children in that program

2. hiring a third party evaluator

3. evaluating in terms of the objectives established by the school district (for example, in relation to the desegregation program: "as long as those schools maintain an ethnic balance along those guidelines, then we're saying that the funds are contributing to maintaining racial balance; if they attract and hold the right proportion of students, then what they're doing must be working")

4. assessing educational impact on basic skills

5. requiring an evaluation component as part of the mini-grant application process

If the activity is new and is either equipment or materials, then accountabilty monitoring or simply recording what they're doing, (e.g., staff, expenditure of funds) is the most likely approach to be taken. Several LEAs noted that there is a shifting from evaluation to monitoring, as funding dries up and monies are allocated to tangible activities, e.g., materials. A loosening up of evaluation requirements from the SEA has also been reflected at the LEA level.

Summary of LEA evaluation directors and Chapter 2 respondent preliminary findings.

Analyzing district-wide test data is the major task of most LEA evaluation units.

LEA evaluation directors reported innovative research and evaluation activities involving:
- -an ethnographic study of school practices and learning
- -a causal modeling study of teaching behaviors and outcomes
- -the adaptation of the evaluation components of previous categorical programs
- -the development of locally run mini-grant programs

Local Chapter 1 Directors

The tasks most often reported by Chapter 1 respondents were (1) assisting evaluation committees, principals, teachers, etc. in doing needs assessments, (2) helping them write measurable objectives for their applications, (3) providing technical assistance in interpreting and presenting their test results, (4) correlating the building programs with the district Chapter 1 program and (5) involvement with specific programs like microcomputer labs, diagnostic/prescriptive programs, and reading resource models.

Chapter 1 directors responded in the following numbers to a question about the focus of their interaction with building staff:

4 technical assistance
3 leadership
2 monitoring
1 supervision
1 consultation
1 support

From their comments, it appears as though monitoring and technical assistance blend together pretty well. For example, one respondent described the relationship with school building staff as follows:

> [it's] more like technical assistance and consultation for [the] purpose of shaping up local evaluations and helping them understand their data.

Another respondent in explaining what was meant by support said:

> We do monitor our buildings. This consists of looking at student selection reports, student selection procedures, looking at curriculum...Then our specialist works with them in specific areas, e.g., reading and math.

Finally, one respondent noted, "I monitor before a school is monitored by federal or state people. I come out and make sure that everything is in tiptop shape. I did this in the past and will continue it in the future."

When asked about the continuation of TIERS, three of the five indicated that it was about the same as before. The others listed such changes as tending to use percentiles rather than Normal Curve Equivalents (NCEs), and eliminating such information as comparability and project description data. One respondent expressed an interest in using the Instructional Accomplishments Information (IAI) System developed at Southwest Regional Laboratory to determine achievement.

In discussing sustained effects studies, four of the five local Chapter 1 directors said that they will continue to do studies as they had done in the past. One said that at present they currently had no plans for a sustained effects study, but "it's one of the things that the district is aware that we have to provide. The evaluation unit will be responsible for getting data from schools, analyzing the data, and generating reports..."

This ongoing commitment to sustained effects studies may be unique to large school districts. Perhaps more generalizable are the comments by the SEA Chapter 1 directory to the effect that, "starting with Chapter 1, some districts [are] documenting things for the first time..."

In general, then, local Chapter 1 directors have not seen much of an effect as far as any changes resulting from ECIA Chapter 1. The exceptions are that, because of reductions in funding, they are serving fewer children, and that they are proceeding with sustained effects studies where these have not formerly been done.

Summary of LEA Chapter 1 director preliminary findings.

LEA Chapter 1 directors and their staff typically provide leadership in setting up district Chapter 1 evaluation committees, give support through consultation and inservice programs, and supervise and monitor building programs to insure their compatability with the district program.

Most large school districts were reported to have Chapter 1 sustained effects studies under way.

LEA Chapter 1 directors reported a relaxation in the testing and reporting requirements of Chapter 1.

## Emerging Evaluation Information and Technical Assistance Needs

Educational program evaluation has on the one hand been dealt a serious blow by the lack of evaluation requirements in the Education Consolidation and Improvement Act of 1981. On the other hand, a unique opportunity is present for this field of study and practice to show its true value.

The Final Report and Recommendations of the Council of Chief State School Officers Consolidation Evaluation Task Force (May 27, 1982) summarizes the situation well:

> With the continued reduced funding, particularly for Chapter 2, the lack of federal requirements and guidelines for information collection and evaluation, and the strong role foreseen for the state advisory committees, the rationale for expending significant resources for evaluation may appear questionable.
>
> Yet the task force feels that the lack of evaluation data could very easily damage prospects for the future of the program. As the shift continues from the federal to the state levels in the management of education programs, the states become more, not less, accountable for them. SEAs and LEAs have become accustomed to the federal government not only requiring the evaluation of programs but also dictating methods of evaluation. Since the federal regulations have been lifted it may be a temptation for SEAs and LEAs to lessen evaluation activities. This could result only in a lack of information for policy decisions, an image of irresponsibility which SEAs and LEAs do not deserve. The task force, therefore, strongly encourages each state to confront the evaluation questions emerging from the ECIA.
>
> (pp. 2-3)

What are some of the important evaluation questions emerging from ECIA and what are their evaluation training and technical assistance implications?

The following sets of questions are based on the summaries of findings which appear at the end of each section of this report. The related training and technical assistance topics are alternatives to the standard approaches that might be used to address these questions. These new topics have been developed by

the Research on Evaluation Program. Their inclusion here is meant primarily to get reactions regarding their relevance to the evaluation questions.

The questions and topics are just a "starter set." We are asking for additional questions and topics as part of the review of this report by our study respondents and other researchers. The purpose is to help us continue to monitor the impact of ECIA on state and local evaluation beyond the life of this study.

The evaluation questions (E.Q.) and their related training and technical assistance (T. & T.A.) topics listed next are grouped under the headings of policy, practice, and outcome.

Policy

E.Q.: How might future reductions in Chapter 1/Chapter 2 budgets be handled in order to maintain the quality of service provided?

T. & T.A.: Multiple alternative modeling in determining fiscal rollbacks during educational funding crises.

E.Q.: What are the anticipated state level costs and benefits of maintaining the Title I Evaluation and Reporting system?

T. & T.A.: Cost/benefit analysis.

E.Q.: What state-wide and district-wide policies need to be set in order to insure the adequate evaluation of Chapter 2 programs?

T. & T.A.: Document analysis and policy formulation.

E.Q.: What state and local policies are needed to insure the appropriate and equitable purchase and use of microcomputers?

T. & T.A.: Value analysis and policy formulation.

E.Q.: To what extent are parents and others adequately included in the Chapter 1 and/or Chapter 2 process?

T. & T.A.: Document analysis, interview and survey techniques.

E.Q.: What paperwork is legally necessary to meet Chapter 1 federal and state mandates?

T. & T.A.: Legislative history and document analysis.

Practice

E.Q.: What form should Chapter 1 supervision, monitoring, technical assistance, and leadership take in order to assure program quality?

T. & T.A.: Conceptual analysis of Chapter 1 program quality, supervision, and the other concepts. The subsequent development of practical guidelines.

E.Q.: What is the actual pattern of Chapter 2 allocations?

T. & T.A.: Public data source analysis.

E.Q.: What are concrete examples of new practices which exemplify flexibility and decentralization resulting from Chapter 1 and/or Chapter 2?

T. & T.A.: Use of ethnographic, photographic, and other qualitative data collection techniques.

E.Q.: How have local Chapter 1 programs changed as a result of reduced funding and decreased staff?

T. & T.A.: Methods for evaluating program implementation.

E.Q.: What evaluation related relationships are emerging between SEA and LEA, and between district and building staff in the implementation of Chapter 2 programs?

T. & T.A.: Organizational development methods.

Outcomes

E.Q.: What is the impact on students of various patterns of Chapter 2 allocations?

T. & T.A.: Management consulting approach to program evaluation.

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|---|---|
| E.Q.: | What impact have changes in flexibility and decentralization had on administrative burden in regard to Chapter 1 and/or Chapter 2? |
| T. & T.A.: | Document analysis and cost-analysis. |
| E.Q.: | What impact have local Chapter 1 staff reductions had on<br>(1) the kinds of students served?<br>(2) the educational achievement of various groups of students? |
| T. & T.A.: | State and local public data sources, quantitative re-analyses. |
| E.Q.: | Will the state and national TIERS outcomes be different as a result of differences in the academic achievement of students served by shrunken Chapter 1 programs? |
| T. & T.A.: | State and national public data sources, quantitative re-analysis. |
| E.Q.: | How might the various local Chapter 2 sustained effects studies be aggregated to produce valid and reliable generalizations? |
| T. & T.A.: | Meta-analysis. |

## FOOTNOTE

1 For interested readers, the American Institutes for Research document is a thorough textual comparison of Title I and Chapter 1 including applicable sections of the Senate and House of Representatives Conference Report.

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## APPENDIX A

### Activities Under Chapter 2

**Subchapter A - Basic Skills Development**

This subchapter grants funds to develop and implement comprehensive and coordinated programs to improve elementary and secondary instruction in the basic skills of reading, mathematics, and written/oral communications.

**Allowable activities:**

1. School-wide diagnostic assessment.
2. Establishment of learning goals and objectives.
3. Pre-service and in-service training.
4. Parent involvement and training.
5. Student testing, program evaluation.
6. Districtwide activities, i.e., learning centers.
7. Other activities to improve basic skills.

**Subchapter B - Educational Improvement and Support Services**

**Allowable activities:**

1. Acquire and utilize school library resources, textbooks and other printed and published materials for use by teachers and students for instructional purposes.

2. Instructional equipment and materials.

3. Programs to improve LEA practices, particularly with activities designed to address educational problems such as the education of children with special needs, i.e., educationally deprived, or gifted and talented children.

4. Addressing problems of minority isolation and concentration, excluding busing.

5. Guidance, counseling and testing programs, including those designed to help prepare students for employment.

6. Programs and projects to improve the planning, management, and implementation of educational programs, including fiscal management.

7. Teacher training and inservice staff development.

8. Desegregation assistance.

Subchapter C - Special Projects

1. Metric education

2. Arts education

3. Parent in-school partnership

4. Pre-school parent partnership

5. Consumer education

6. Youth employment

7. Career education

8. Environmental education

9. Health education

10. Law-related education

11. Population education

12. Youth correction education

13. Biomedical and medical sciences education

14. Community schools

15. Gifted and talented education

16. Establishment of educational proficiency standards

17. Safe schools/vandalism

18. Ethnic heritage studies

## APPENDIX B

### Chapter 1 Application Assurances

The application described in subsection (a) shall be approved if it provides assurances satisfactory to the state educational agency that the local educational agency will keep such records and provide such information to the state educational agency as may be required for fiscal audit and program evaluation (consistent with the responsibilities of the state agency under their chapter), and that the programs and projects described--

(1) (A) are conducted in attendance areas of such agency having the highest concentration of low-income children;
(B) are located in all attendance areas of an agency which has a uniformly high concentration of such children; or
(C) are designed to utilize part of the available funds for services which promise to provide significant help for all such children served by such agency;

(2) are based upon an annual assessment of educational needs which identifies educationally deprived children in all eligible attendance areas, permits selection of those children who have the greatest need for special assistance, and determines the needs of participating children with sufficient specificity to ensure concentration on those needs;

(3) are of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting the special educational needs of the children being served and are designed and implemented in consultation with parents and teachers of such children;

(4) will be evaluated in terms of their effectiveness in achieving the goals set for them, and that such evaluations shall include objective measurements of educational achievement in basic skills and a determination of whether improved performance is sustained over a period of more than one year; and

(5) make provision for services to educationally deprived children attending private elementary and secondary schools in accordance with section 557.

(PL 97-35, August 13, 1982, p. 95 STAT. 465)